

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

IN RE:	§	
	§	CASE NO. 15-20032
TEXAS ENTERPRISES, LLC d/b/a	§	
BLUEBONNET ELITE ASSISTED	§	
LIVING	§	
	§	CHAPTER 11
DEBTOR.	§	

DATE AND TIME OF HEARING:

1. Tuesday, November 17, 2015, at 9:30 a.m.

NATURE OF PROCEEDING:

1. Motion for Valuation [DKT # 57]

EXHIBIT LIST

of Debtor, Texas Enterprises, LLC (“Debtor”)

[* Debtor, requests that the Court take judicial notice of the pleadings on file with the Court, including the exhibits listed below marked with an asterick (*) and are available for review on the Court’s PACER website and have been previously copied to the appropriate interested parties]

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
1.	Debtor’s Appraisal of 102 Floyd St., Naples, TX			
2. *	Debtor’s Amended Schedule B			
3. *	Proof of claim #5 of MUFG Union Bank, N. A.			
4. *	Proof of claim #6 of MUFG Union Bank, N. A.			
5. *	Docket Report and any document listed thereon			
	Debtor reserves the right to offer as an exhibit any document or exhibit designated or offered by any other interested party in the above referenced matters.			

**WITNESS LIST
of Debtor**

1.	Chris Diamond, Appraisal Firm of Texas
2.	Tammy Makowiecki
3.	Ziggy Makowiecki

4.	Jan Litwin
5.	Any authorized Officer, Agent or Representative designated by Debtor
6.	Any authorized Officer, Agent or Representative designated by MUFG Union Bank, N. A.
	Debtor, reserves the right to call any witnesses designated or called by any other interested party.

Debtor reserves the right to supplement this Witness and Exhibit List as necessary.

Dated November 12, 2015.

Respectfully Submitted,
SEARCY & SEARCY, P.C.

By: /s/ Joshua P. Searcy
Jason R. Searcy, SBN 17953500
Joshua P. Searcy, SBN 24053468
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Attorneys for Debtor

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been forwarded via electronic mail, pursuant to the Electronic Case Management system of the United States Bankruptcy Court for the Eastern District of Texas on November 12, 2015; and served by regular mail, postage prepaid to the following interested parties shown below.

/s/ Joshua P. Searcy
Joshua P. Searcy

Texas Enterprises, LLC
Attention: Jan Litwin, President
102 Floyd St.
Naples, TX 75568

Union Bank
c/o Richard Anderson
Anderson, Burns & Vela, LLP
8111 LBJ Frwy., Ste. 1501
Dallas, TX 75251